

REMARKS

Reconsideration of the application in view of the above amendments and the following remarks is respectfully requested. Claims 1-12 and 22-50 have been cancelled. Claims 13-15 and 19-21 have been amended. Claims 13-21 are currently pending in the application.

CLAIM REJECTIONS – 35 U.S.C. § 101

In the Office Action, the Examiner rejected claims 1-21 under 35 U.S.C. § 101 as not producing a useful, concrete, and tangible result. Claims 1-12 have been cancelled. With regard to claims 13-18, Applicant has amended independent claim 13 to recite a “computer-implemented method” that includes the step of “generating code”. Applicant respectfully submits that the step of generating code in and of itself constitutes a useful and tangible result because the generated code can be used by a software system for decoding the hierarchical structure stored in the code and for generating a graphical representation of the hierarchical structure. (Paragraphs 0057-0058) Therefore, Applicant believes that independent claim 13 and claims 14-18, which depend upon independent claim 13 and necessarily includes all of claim 13’s limitations, satisfy the requirements of 35 U.S.C. § 101.

Independent claim 19 recites a “computer-readable medium having computer-executable instructions for performing a method for generating a message structure for a message for making an application program interface (API) call”. Applicant respectfully submits that the computer-readable medium recited in claim 19 is itself a physical and tangible medium that satisfies the requirements of 35 U.S.C. § 101.

Independent claim 20 recites a “system for generating a message structure for a message for making an application program interface (API) call”. Applicant respectfully submits that the system recited in claim 20 is similarly itself a physical and tangible item that satisfies the requirements of 35 U.S.C. § 101. Claim 21 depends upon independent claim 20 and necessarily includes all of the limitations in claim 20. Therefore, claim 21 also satisfies 35 U.S.C. § 101.

In light of the foregoing, Applicant requests that the rejection under 35 U.S.C. § 101 be withdrawn.

#### CLAIM REJECTIONS – 35 U.S.C. § 103

In the Office Action, the Examiner rejected claims 1-12 under 35 U.S.C. § 103(a) as being unpatentable over Ching et al. (U.S. Pat. 6,407,761, hereinafter “Ching”) in view of Vedula et al. (U.S. 6,823,495, hereinafter “Vedula”). The Office Action also rejected claims 13-14 and 16-20 under 35 U.S.C. § 103(a) as being unpatentable over Ching in view of Vedula in further view of Brozowski et al. (U.S. 6,559, 871, hereinafter “Brozowski”).

Claims 1-12 have been cancelled. The rejection of claims 13-14 and 16-20 is respectfully traversed.

#### Claim 13

Claim 13 has been amended to clarify certain elements of the claim, and as amended, now recites:

A computer-implemented method for generating a message structure for a message for making an application program interface (API) call in a graphical user interface, the method comprising:

- displaying a representation for a root node in response to a request to display a new message structure, where the representation appears in a pane of the graphical user interface;
- receiving a request to add a child node to the root node, where the child node is selected from the group consisting of element nodes, field nodes, method nodes, and parameter nodes;
- displaying a representation of the added child node to the root node such that a hierarchical relationship between the added child node and the root node is illustrated in a hierarchical tree; and
- automatically generating code for the message structure, wherein the message structure is represented by the hierarchical tree, wherein the code includes embedded delimiters that indicate a hierarchical structure of the message structure, and wherein the message structure corresponds to a message for making the API calls.

Claim 13 provides an advantageous method for automatically generating code that represents an updated hierarchical structure of a message structure, where the hierarchical structure has been updated via a graphical user interface. As noted in the Specification, “[t]he graphical representation forms part of a drag and drop interface, which advantageously permits the structure to be modified in an intuitive manner”. (Paragraph 0058) Furthermore, a “text representation enables the extended structure to be compactly or efficiently stored for later retrieval. (Paragraph 0057) Therefore, the method recited in claim 13 advantageously allows a user to modify a hierarchical structure intuitively through a graphical interface and then generates code to store the modified hierarchical structure in a compact and efficient form.

Such a method is neither disclosed nor suggested by Ching. The portions of Ching cited by the Examiner merely disclose that a Business Object contains attributes which may be accessed via the Business Object’s interface methods (Ching col. 4 ln. 66-67 to col. 5 ln 1-5, col. 5 ln. 23-29). Indeed, these cited portions do not disclose any automatic generation of code. Viewed as whole, the Ching reference discloses a method that allows a user to customize the interfaces of business objects, where the business

objects' interfaces may be viewed and customized graphically (col. 2 ln 45-63). Ching also discloses that code may be generated based on the user's customization (col. 3 ln. 3-9).

However, the generation of code in Ching is markedly different from the generation of code in the instant Application. First, while Ching discloses a method that allows a user to customize interfaces, this method does not allow a user to change the hierarchy in a hierarchical structure as recited in claim 13. Furthermore, the code generated in Ching is code for implementing a business object. In contrast, the code generated in claim 13 represents and describes a hierarchical structure. Overall, the Ching reference is not concerned with modifying and describing hierarchical structures, and there is no teaching or suggestion whatsoever of automatically generating code that describes a modified hierarchical structure. Therefore, Ching does not disclose or suggest at least this aspect of claim 13.

Assuming for the sake of argument that it would have been obvious to combine the secondary references cited in the Office Action (Vedula and Brozowski) with Ching, these references also fail to cure the deficiencies identified in Ching. Vedula was only cited as allegedly disclosing the use of delimiters to indicate hierarchical structure, and Brozowski was only cited as allegedly disclosing the display of a root node and the display of a child node added to the root node. Significantly, neither of these references discloses automatically generating code that describes a modified hierarchical structure. Thus, even if these references were combined, they still would not teach or suggest at least this aspect of claim 13.

Therefore, Applicant submits that claim 13 is patentable over Ching, Vedula, and Brozowski, taken individually or in combination.

Claims 14-18

Claims 14-18 depend from claim 13 and recite further advantageous aspects of the invention. Applicant submits that claims 14-18 are patentable over Ching, Vedula, and Brozowski for at least the reasons given above in connection with claim 13.

Claim 19

Independent claim 19 is a computer readable medium claim that includes features similar to those in claim 13. Applicant submits that claim 19 is patentable over Ching, Vedula, and Brozowski for at least the reasons given above in connection with claim 13.

Claim 20

Independent claim 20 is a system claim that includes features similar to those in claim 13. Applicant submits that claim 20 is patentable over Ching, Vedula, and Brozowski for at least the reasons given above in connection with claim 13.

Claim 21

Claim 21 depends from claim 20 and recite further advantageous aspects of the invention. Applicant submits that claim 21 is patentable over Ching, Vedula, and Brozowski for at least the reasons given above in connection with claim 20.

ALLOWABLE SUBJECT MATTER

In the Office Action, the Examiner acknowledged that claims 15 and 21 would be allowable if rewritten to incorporate the limitations of the base claim and any intervening

claims. Applicant thanks the Examiner for this acknowledgement. However, in view of the arguments presented above, Applicant does not believe that such amendment will be necessary at this time.

CONCLUSION

For the foregoing reasons, Applicant submits that all of the pending claims are allowable over the art of record, including the art cited but not applied. Accordingly, allowance of all pending claims is hereby respectfully solicited.

The Examiner is invited to contact the undersigned by telephone if the Examiner believes that such contact would be helpful in furthering the prosecution of this application.

No fee is believed to be due specifically in connection with this Reply. To the extent necessary, Applicant petitions for an extension of time under 37 C.F.R. § 1.136. The Commissioner is authorized to charge any fee that may be due in connection with this Reply to our Deposit Account No. 50-1302.

Respectfully submitted,

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by

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